K092389

# 5. 510(k) Summary

## 1. Company Identification

SUZUKEN CO, LTD.

OCT 1/3 2009

8 Higashikataha-machi, Higashi Nagoya, Aichi, JAPAN 46191

Tel: +81-52-950-6327 Fax: +81-52-950-7440

#### 2. Official Correspondent

Motokazu Takeuchi (Mr.) Senior Manager

#### 3. Date of Submission

August 4, 2009

#### 4. Device Trade name

Disposal ECG electrodes, Model Easyrode

#### 5. Common/Usual Name

Electrocardiograph Electrode

### 6. Classification Number

Electrocardiograph Electrode classified in Class II per 21 CFR 870.2360, DRX

#### 7. Predicate Device

Manufacturer

: 3M Health Care

**Device Name** 

: 3M Red Dot 2560 Monitoring Electrode with Foam Tape and

Stickey Gel

510(k) No.

: K970796

8. Description of the Device

Easyrode is a self-adhesive, non-sterile, single use disposable electorode which

includes a silver/silver chloride sensing element and conductive gel.

These electrodes include a pressure sentive adhesive non-woven tape which hold the

conductive elements of the electrodes in place on the patient's skin for short or long

term ECG procedures.

9. Intended Use

The Easyrode is intended for use in ECG Monitoring. The Easyrode can be used in all

ECG applications where standard ECG monitoring electrodes are used. This

electrode can be used for short term and long term (2 Days) monitoring.

10. Technological Characteristics

Intended for Use

Easyrode: Used for short time and long time (up to 2day)

Predicate device: Used for short time and long time (2day)

Easyrode is used for 2day and below.

Material:

Easyrode: Non-woven tape

Predicate device: Foam tape

Non-woven is allow air pass through easily than foam.

That means non-woven is more adhesive to patient skin

Comparison table of the principal characteristics of 2 devices is shown in the 9

Substantial Equivalence Discussions.

## 11. Conclusion

The results of these measurements demonstrated that the Easyrode is as safe, as effective, and performs as well as the predicate device.





Food and Drug Administration 10903 New Hampshire Avenue Document Control Room W-066-0609 Silver Spring, MD 20993-0002

Suzuken Co., Ltd c/o Mr. Koji Kubo Cosmos Corporation 3F, 2-17-6 Akebono-cho Tachikawa-shi, Tokyo 190-0012 JAPAN

OCT 1 3 2009

Re: K092389

Trade/Device Name: Disposal ECG Electrodes, Model Easyrode

Regulation Number: 21 CFR 870.2360

Regulation Name: Electrocardiograph electrode

Regulatory Class: II (two) Product Code: MLN Dated: July 31, 2009 Received: August 5, 2009

Dear Mr. Kubo:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <a href="http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm">http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm</a> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

For Bram D. Zuckerman, M.D.

Director

Division of Cardiovascular Devices Office of Device Evaluation Center for Devices and Radiological Health

**Enclosure** 

510(K) Number (if known)

K092389

Device Name: Disposal ECG electrodes, Model Easyrode

#### Indications For Use:

The Easyrode is intended for use in ECG Monitoring. The Easyrode can be used in all ECG applications where standard ECG monitoring electrodes are used. This electrode can be used for short term and long term (2 Days) monitoring.

Concurrence of CDRH	I, Office of D	Device Evaluation (OI	DE)
NEEDED)			
(PLEASE DO NOT WRITE BELOW	THIS LINE	-CONTINUE ON AI	NOTHER PAGE IF
(Per 21 CFR 801.109 Subpart D)	(21 CFR 807 Subpart C)		
Prescription Use X	AND / OR Over-The Counter Use		

(Division Sign-Off)
Division of Cardiovascular Devices

510(k) Number <u>18923</u>